

South Lane School District 45J3

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April 7, 2008

Dan Duncan
Regional PCB Program Manager
U.S. EPA, Region 10
Solid Waste & Toxics Unit
Office of Compliance & Enforcement
1200 Sixth Avenue
Seattle, WA 98101



RE: South Lane School District, Submission of PCB Remediation Plan for Lighting Retrofit Work

Dear Mr. Duncan:

The district will be self-performing miscellaneous PCB remediation work in the course of general maintenance on fluorescent lighting fixtures. Following the results of an environmental self-audit of all of our pre-1980 facilities it is assumed that a large number of the light ballasts we will come in contact with potentially contain PCB concentrations above 50 ppm which would subject them to the current regulatory statutes of the Toxic Substances Control Act under 40 CFR Part 761. In addition, any associated spill material the district may identify during the course of this work will also be assumed to contain PCB concentrations above 50 ppm.

The district has completed personnel training of our staff who will be responsible for compliance relating to the requirements of the EPA's PCB regulations governing the removal, cleaning, storage, transportation, and disposal of leaking or un-intact ballasts and associated spill material assumed to contain PCB's.

Please see the attached PCB Remediation Plan the district has prepared which outlines the overall procedures to be followed during the course of this work.

Please contact me if you need any additional information regarding these projects at (541) 942-1601.

Sincerely,

Ron Lester, Maintenance Supervisor
South Lane School District

SOUTH LANE SCHOOL DISTRICT 45J3

455 Adams Street Cottage Grove, OR 97424



April 2, 2008

PCB REMEDIATION PLAN

South Lane School District No. 45J3

REPRESENTED FACILITIES:

District Maintenance Shop
Al Kennedy Alternative High School
Cottage Grove High School
Lincoln Middle School
Bohemia Elementary School
Delight Valley Elementary School
Dorena School
Harrison Elementary School
Latham Elementary School
London School
Transportation Department/Maintenance Office
Warehouse/Storage
District Service Center
Daugherty Swim Center
Recreation Office

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Introduction

Following the results of an Environmental Self Audit concerning non-intact assumed polychlorinated biphenyl (PCB) ballasts and potential PCB contaminated light fixtures, South Lane School District is submitting this PCB contamination Remediation Plan in compliance with current EPA, TSCA regulations. This PCB Remediation Plan addresses the process and procedures for the proper removal and disposal/incineration of assumed PCB containing fluorescent light ballasts and the decontamination of assumed PCB containing spill materials to be performed in district facilities.

The district will self-perform (utilizing district personnel and electricians) the work identified in this Remediation Plan during routine maintenance activities and general lighting retrofit work at the listed facilities, with all PCB-related waste and materials consolidated and stored at the District Maintenance Shop. During extended spring, summer, and winter breaks, the district will perform the removal of identified leaking ballasts and the clean-up of associated spill materials on a larger scale. If in the future appropriate funding becomes available, it is the Districts intention to hire a contractor to perform the remaining work. The transportation and incineration of all PCB containing waste generated during the course of this work will be contracted to the below mentioned agencies.

Contact Information:

Owner/Generator: **South Lane School District 45J3**
455 Adams Street
Cottage Grove, OR 97424

Superintendent: **Krista Parent**, Superintendent
Phone: (541) 942-3381

Project Contact: **Ron Lester**, Facilities Manager
Phone: (541) 942-1601
Fax: (541) 942-7495

Consultant: **Willamette Education Service District**
2611 Pringle Road SE
Salem, OR 97302

Project Manager: **Matt Daly**
Cell: (503) 931-9387
Phone: (503) 385-4693
Fax: (503) 540-2959

LOCATIONS OF PCB REMEDIATION WORK TO BE PERFORMED:

District Maintenance Shop

1000 Taylor St.
Cottage Grove, OR 97424

This site is the consolidation point of district wide PCB containing fluorescent ballasts and cleaning materials.

PCB remediation is expected to be performed at the following facilities in the course of regular maintenance.

Al Kennedy Alternative High School

1310 S 8th PO Box 218
Cottage Grove, OR 97424-0218

Cottage Grove High School

1375 S River Rd
PO Box 160
Cottage Grove, OR 97424-0062

Lincoln Middle School

1565 S 4th St
Cottage Grove, OR 97424-2999

Bohemia Elementary School

721 S "R" St
Cottage Grove, OR 97424-1830

Delight Valley Elementary School

79980 Delight Valley
Cottage Grove, OR 97424-9595

Dorena School

37141 Row River Rd
Dorena, OR 97434-9801

Harrison Elementary School

1000 S 10th
Cottage Grove, OR 97424-2599

Latham Elementary School

32112 Latham Rd
Cottage Grove, OR 97424-9399

London School

73288 London Rd
Cottage Grove, OR 97424-9299

Transportation Department/Maintenance Office

1665 South 4th Street
Cottage Grove, OR 97424

Warehouse/Storage

1119 S 4th St
Cottage Grove, OR 97424

District Service Center

455 Adams Ave
Cottage Grove, OR 97424

Daugherty Swim Center

1440 S 8th St
Cottage Grove, OR 97424

Recreation Office

1000 S Taylor St
Cottage Grove, OR 97424

PROJECT SCHEDULE:

Ongoing Maintenance

ANALYTICAL LABORATORY:

Address: Neilson Research Corp
245 S Grape St
Medford, OR 97501

Contact: Sean Neilson, President
Phone: (541) 474-5703
Fax: (541) 474-5705

HAZARDOUS WASTE TRANSPORTER:

Address: WasteWatch, Inc.
878 NW Dunbar Ave.
Troutdale, OR 97060

Phone: (503) 465-8683
Fax: (503) 465-1843

Scope of Work

WORK SUMMARY

This work consists of the decontamination of assumed PCB spill material, removal of intact and non-intact assumed PCB containing fluorescent light ballasts, HID capacitors, and the removal of mercury vapor containing lamps as addressed in this PCB Remediation Plan. The work will be performed only in the areas identified by district personnel during the course of the maintenance or general lighting retrofit work. All work shall take place by district personnel following the general conditions and work procedures addressed in this Remediation Plan and project scope of work.

South Lane School District will provide all material, labor and equipment necessary to accomplish the following work.

Removal and disposal of the following materials according to this Remediation Plan and as additionally represented throughout this project Scope of Work and as addressed in the Environmental Self Audit.

Removal and proper disposal, reclamation, or incineration of any identified Non-Intact assumed PCB containing fluorescent light ballast.

Cleaning and decontamination of assumed PCB containing spill material from all fluorescent light fixtures as listed below.

Containerization, transportation, and proper incineration of all assumed PCB containing light ballasts and contaminated cleaning materials.

The transportation and proper incineration of all stored PCB containing fluorescent light ballasts and HID capacitors currently stored on district property.

The transportation and recycling of all identified mercury vapor lamps from fluorescent light fixtures and stored materials.

Generation of all regulatory required PCB remediation documentation and waste manifests for district records.

PCB / MERCURY LAMP REMEDIATION GUIDELINES

POLYCHLORINATED BIPHENYL (PCB) LIGHT BALLAST, AND PCB SPILL REMEDIATION AND MERCURY-CONTAINING LAMP REMOVAL AND DISPOSAL REMEDIATION PLAN

PART 1 – GENERAL

1.1 SCOPE

- A. District shall provide all labor, materials, equipment, services, permits and insurance required to complete the proper removal and disposal of PCB-containing light ballasts and mercury-containing lamps.
- B. In fixtures to be retrofit, District will be responsible for the removal and disposal of all PCB and non-PCB containing ballasts, containerization of ballasts removed, cleaning and decontamination of all PCB containing spill material from fixtures, and the removal and recycling of all lamps.
- C. In fixtures to be replaced, District will be responsible for the removal and disposal of all PCB and non-PCB containing ballasts, containerization of ballasts removed, cleaning and decontamination of all PCB containing spill material from fixtures, and the removal and recycling of all lamps. In addition, the fixture will be recycled as scrap metal. In the event that fixtures indicating potential PCB contamination are scheduled for direct recycle or incineration as a bulk product waste, District shall be responsible for all transportation and disposal costs.
- D. Hazardous Materials Abatement Drawings (if applicable), lighting design schedules, or other supplied documents within this specification indicate the general locations and quantities of PCB-containing fluorescent light fixtures with mercury-containing lamps. The removal methods are described in this Specification.

1.2 DEFINITIONS

- A. Authorized designated representative: a representative of any regulatory or other agency or Owners Project Manager, having jurisdiction over the project, and having responsibilities regarding the enforcement of project specifications.
- B. Certificate of Disposal: A document that certifies disposal of specifically identified PCB waste and which must be provided to the generator within 30 days of completion of disposal. Such Certificates of Disposal must be retained by the generator for at least 3 years after the generator ceases using or storing PCBs.

- C. Controlled Area: Area which only qualified and properly protected workers or authorized visitors may have access.
- D. Decontamination: The removal by cleaning of all PCB or assumed PCB containing materials from fixture housing, ballast, drip pans, lamps, wiring, or surrounding environment. Decontamination of PCB containing spill material shall follow the double wash / rinse method procedures for decontaminating non-porous surfaces as listed in EPA regulations 40 CFR 761 Subpart S. Decontamination may also include the cleaning of PCB materials from tools, personal effects, or persons.
- E. Destination Facility: A facility that treats, disposes of, or recycles universal waste. Facilities treating universal waste as allowed under 40 CFR 273.13, 273.33 or OAR 340-112-030(5) are not considered to be destination facilities. A facility, at which universal waste is only accumulated, is not a destination facility for purposes of managing universal waste.
- F. Disposal: Procedures necessary to transport and deposit the PCB materials in an approved waste disposal site in compliance with EPA and other applicable regulations. Disposal Site shall be an approved landfill, incinerator or recycler for PCB-containing waste as determined by the specification scope of work.
- G. Electric Lamp: The bulb or tube portion of a lighting device specifically designed to produce radiant energy, most often in the ultraviolet (UV), visible, and infra-red (IR) regions of the electromagnetic spectrum. Examples of common electric lamps include, but not limited to incandescent, fluorescent, high intensity discharge, and neon lamps.
- H. Environmental Consultant: Environmental consultant specializing in hazardous materials abatement- Project Manager - or any subcontractor designated by Owner.
- I. Incineration: The destruction of PCBs by an EPA-approved and permitted facility. The facility must be an EPA/TSCA-permitted incinerator and a licensed TSDF, Transportation Storage and Disposal Facility. All operating permits must be current and valid for the duration of this project contract.
- J. Landfill: For the purpose of this specification regarding PCB containing materials and items, landfill refers to a TSCA permitted hazardous waste landfill in compliance with 40 CFR 761.75.
- K. Manifest: The shipping document, EPA Form 8700-22, and any continuation sheet attached to EPA Form 8700-22, originated and signed by the generator of PCB waste in accordance with the instructions included with the form.
- L. Mercury Containing Lamp: An electric lamp in which mercury is purposely introduced by the manufacturer for the operation of the lamp.
- M. MSDS: Material Safety Data Sheet supplied by manufacturer provides information on a product listed in OSHA 29 CFR 1910.1200(g) (2).
- N. Off-site Collection Site: A site that receives and accumulates universal waste from off-site.
- O. PCB-contaminated: Any substance or material containing between 5 and 500 ppm PCB. Toxic Substances Control Act regulations for PCB-contaminated materials apply to materials containing between 50 and 500 ppm PCBs or waste disposal.
- P. PCB Waste: Mineral oil dielectric fluid from PCB-contaminated electrical equipment, liquids other than mineral oil dielectric fluid, any non-liquid PCBs at concentrations of 50 ppm or greater.

- Q. Polychlorinated Biphenyls (PCBs): A class of chlorinated hydrocarbon compounds containing a variable number of chlorine atoms. Commercially available products contain mixtures of as many as 40 to 70 PCB compounds (isomers). PCBs range from oily liquids to white, crystalline solids to hard, non-crystalline resins or waxy solids.
- R. Universal Waste: Any waste that is a universal waste listed in 40 CFR 273.1 and OAR 340-113-010 and subject to the universal waste requirements of 40 CFR Part 273 and OAR 340 Division 113.
- S. Waste Manifest: A Uniform Hazardous Waste Manifest shall accompany all waste materials containing PCB in concentration >50 ppm. Waste requirements of 40 CFR 761.207 – 761.209 shall apply to all PCB containing waste transported off site.
- T. Waste Shipment Records: Form similar to Uniform Hazardous Waste Manifest or an EPA approved state form.

1.3 DOCUMENTS INCORPORATED BY REFERENCE

- A. The current issue of each document shall govern. Where conflict among requirements or with these Specifications exists, the most stringent requirements shall apply.
 - 1. U.S. Environmental Protection Agency Toxic Substance Control Act, TSCA, (Code of Federal Regulations Title 40, Part 761)
 - 2. U.S. Environmental Protection Agency Office of Toxic Substances Guidance Document, *Summary of PCB Regulations*, EPA Document Number 910-S-94-002.
 - 3. U.S. Department of Labor, Occupational Safety and Health Administration (OSHA)
 - 4. RCRA. Resource Conservation and Recovery Act, 40 CFR Part 2761, Subpart D., 40 CFR 273.
 - 5. Oregon Administrative Rules: Hazardous Waste Regulations, OAR 340-100 through 340-104; Universal Waste Management Regulations, OAR 340-113.

1.4 SUBMITTALS AND NOTICES

- A. The Owner (Generator) shall be responsible for the submission of a PCB remediation plan to the U. S. Environmental Protection Agency Region-10 in accordance with the requirements of 40 CFR 761.61(a) regarding the self Implementation remediation plan for PCB containing spills.
- B. The Owner shall be responsible for the submission of the EPA Form OMB No. 2070-0112 (Notification of PCB Activities) for all applicable facilities.
- C. The Owner shall be responsible for the submission of the self disclosure of any PCB violations discovered by the PCB self-audit of facilities and any additional information obtained during and at the completion of this work.
- D. District shall provide to the EPA all required close-out documents following the execution of work in accordance with procedures outlined in this specification.

1.5 PERSONNEL PROTECTION

- A. Personnel Protective Equipment for PCB Removal
 - 1. Worker personal protective equipment (PPE) shall consist of PCB-resistant clothing, safety glasses/goggles, and PCB chemical resistant gloves.

2. District shall be responsible for furnishing all eye, hearing, head, and fall protection as required by current Oregon OSHA regulations and specific job site conditions.
- B. Personnel Protective Equipment for Mercury-Containing Lamp Removal
 1. Caution should be taken by the District to minimize lamp breakage as escaping vapors from a broken lamp may expose workers to unsafe levels of mercury. Increased personal protective equipment is not required for handling unbroken lamps. If breakage occurs, the District shall not attempt to clean up the resulting debris without wearing the following personal protective equipment:
 2. Chemical resistant gloves and clothing (compatible with mercury) to minimize dermal contact with debris,
 3. Chemical cartridge or canister respirator providing protection against mercury vapor and equipped with an end of service life indicator,
 4. Additional respiratory protection shall be as required by governing regulations.
- C. Worker Decontamination Area
 1. Where PCB ballast removal, cleaning of PCB spills from light fixtures, or mercury-containing lamp removal is performed in conjunction with asbestos or lead abatement this area need not be established if a decontamination facility is installed.
 2. The District shall provide a decontamination /emergency clean up area consisting of PCB-resistant sheeting (polyurethane drop cloth) with absorbent material and other necessary equipment. Washing facilities with hot water and detergent/soap that is capable of removing oily compounds without injury to human skin.

1.6 SAFETY

- A. With regard to the work of this contract, the safety of the District's employees, the Owner's employees, and the public is the sole responsibility of the District.

1.7 LIABILITY

- A. The District will be responsible to faithfully perform and follow the provisions of these Specifications and the requirements of the governing agencies. Notwithstanding the failure of the Owner or the Owners Project Manager to discover a violation by the District of any of the provisions of these Specifications, or to require the District to fully perform and follow any of them, such failure shall not constitute a waiver of any of the requirements of these Specifications which shall remain fully binding upon the District.

1.8 QUALITY ASSURANCE

- A. The Owners shall perform periodic inspections to observe the removal, handling, packaging, decontamination, storage, and all other procedures during the course of the hazardous materials removal and disposal.
- B. The Project Manager shall notify the District in writing to stop work if it is determined that work practices are in violation of the Specifications or work is endangering workers and occupants of the building. The District shall continue work when conditions and actions are corrected and when written authorization is received from the District.

1.9 LIMITS

- A. The District shall limit PCB levels as follows:
 - 1. Airborne concentrations below 1 ug/m³ (microgram per cubic meter) or pre-abatement background levels, where available.
 - 2. Concentrations below 10 ug/100cm² (microgram per 100 square centimeters) of building surfaces.
- B. The District shall limit mercury levels as follows:
 - 1. Airborne concentrations shall be maintained below 0.5 mg/m³ (milligram per cubic meter) or pre-abatement background levels, where available.

PART 2 - ABATEMENT

2.1 PCB ABATEMENT

- A. Plastic Sheet: Plastic sheeting shall be flame-retardant polyethylene material. It shall not dissolve on contact with PCB compounds or any chemicals used by the District for abatement/decontamination. The minimum thickness shall be 6-mil.
- B. Storage Containers: Storage containers shall be suitable to receive and retain any PCB-containing or contaminated materials until disposal or incineration at an approved site. They shall comply with container specifications set forth in 49 CFR 178.80, 178.82, 178.102 or 178.116. Containers shall be labeled with waterproof print and permanent adhesive in accordance with OAR, OSHA, DOT and EPA regulations.
- C. Warning labels on all disposal containers/drums shall include the following information:

DANGER
CONTAINS POLYCHLORINATED BIPHENYLS
CANCER HAZARD
- D. Warning Signs: Unless other signage or security access is provided, warning signs shall be provided and displayed at each regulated area to warn of the presence of PCBs.

2.2 MERCURY-CONTAINING LAMP ABATEMENT

- A. Storage Containers: A container for lamps must be closed, structurally sound, compatible with the contents of the lamp, and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.
- B. Labeling/Marking for mercury-containing lamps. In addition to the requirements in 40 CFR 273.14 and 40 CFR 273.34, universal waste mercury containing lamps (i.e. each lamp) or a container in which the lamps are contained must be labeled or marked clearly with any one of the following phrases:

UNIVERSAL WASTE • MERCURY-CONTAINING LAMP(S), or
WASTE MERCURY CONTAINING LAMP(S), or
USED MERCURY CONTAINING LAMP(S).

PART 3 - EXECUTION

3.1 WORK AREA PREPARATION

- A. Where the work area containment requirements are determined by abatement of other hazardous materials, the District may not need to provide any additional isolation procedures.
- B. PCB Abatement: Where no other hazardous materials abatement is performed in conjunction with the PCB abatement prepare the work area as follows:
 - 1. District shall isolate the work area from unauthorized, unqualified and unprotected persons. At a minimum, warning signage indicating the presence of PCBs and danger demarcation tape shall be used. Whenever possible doors should be closed to further reduce unauthorized access.
 - 2. An approved disposable floor covering (i.e. plastic sheeting) shall be kept beneath the work and in areas of dismantling, consolidation or packaging if non-intact ballasts or spill materials have been identified.
 - 3. Disposable non-porous coverings shall be installed in a way to prevent any potential PCB contaminated materials or liquid to come in contact with building materials or furnishings.
 - 4. Provide an approved worker decontamination area as described in section 1.05 Personal Protection (C).
- C. Mercury-Containing Lamp Abatement: If the District handles the lamps to minimize any breakage, then no special precautions are necessary other than items listed below:
 - 1. Provide mercury cleanup equipment to immediately transfer any material recovered from a spill or leak to a container that meets the requirements of 40 CFR 262.34.
 - 2. Ensure that the area is well-ventilated and monitored in the event of breakage, to ensure compliance with applicable OSHA exposure levels for mercury.

3.2 REMOVAL OF INTACT (NON-LEAKING) PCB-CONTAINING LIGHT BALLASTS AND MERCURY-CONTAINING LAMPS

- A. District shall isolate work area and perform work at times and in a manner that will not result in the release or discharge of PCBs or mercury vapor or the exposure to employees or other building occupants.
- B. District shall carefully handle light ballasts and lamps and shall not break, drop, throw or otherwise damage the ballasts and lamps.
- C. Lamps and intact (non-leaking) PCB containing ballasts shall be removed from fixtures and immediately containerized in approved containers to prevent further damage to materials.
- D. Intact (non-leaking) PCB containing ballast shall be disposed of as a hazardous solid waste. The best option for non-leaking PCB ballasts is to recycle them at a facility with EPA approval for recycling PCB ballasts or incineration. Use a transporter with a PCB activity identification number from EPA to transport ballasts to a recycling facility. Non-leaking PCB ballasts that aren't recycled must be managed and disposed as hazardous waste. Non-leaking PCB ballasts or capacitors are first packed with absorbent packing material and sealed in containers prior to transport to be recycled or disposal at an EPA approved incinerator.

- E. District shall take added precaution where there are any indications of leaking ballasts or when cleaning or decontaminating spill materials from fixtures. Non-intact or (leaking) ballasts shall be handled as hazardous waste under the conditions as addressed later in this section.
- F. Should lamp breakage occur the Owners Project Manager shall determine if resulting released material is hazardous waste and if so, the District shall manage it as a hazardous waste.

3.3 REMOVAL OF NON-INTACT (LEAKING) PCB-CONTAINING LIGHT BALLASTS

- A. The Clean up and decontamination of PCB contaminated leaks shall be performed by District personnel using the following guidelines:
 - 1. District shall draw a diagram indicating where contamination is found. Use the forms provided in this section. Make copies as needed. Be clear, concise and fill in all blanks.
 - 2. Avoid unnecessary spreading of PCB material during the clean up.
 - 3. Leaks unto nonabsorbent surfaces can be initially cleaned with rags or paper towels or, if hardened, by using a putty knife. Remember not to mix contaminated tools with "clean" tools or with clean materials and be sure to decontaminate your tools after the job.
 - 4. Perform a double wash procedure. Wash contaminated areas and the light fixture cavity with a specified solvent or detergent and then wipe rinse with rubbing alcohol, acetone, or another approved product. Repeat the wash procedure a second time. Washing with a solvent or detergent should be done in a way to minimize and liquid residue. Absorb all liquids in rags or paper towels. Be careful not to contaminate stock containers of solvents or detergents. Pump-sprayers work well for the solvents and help to reduce contamination of stock solvent.
 - 5. When dry, outline a 10-centimeter (four-inch) square at the original point of contamination. Use your diagram dimension specifics to re-locate this area.
 - 6. District shall thoroughly clean all visible assumed PCB spill contamination from fixtures prior to post cleaning wipe sampling procedures. Approximately 5-15 percent of the cleaned fixtures will be tested. Post cleaning clearance wipe sampling shall be performed by wiping a 100 sq. cm. area where the bulk of the spill contamination was evident prior to cleaning. Wipe samples shall be analyzed by a third party EPA, AIHA, accredited laboratory.
 - 7. Fixtures which indicate detectable PCB levels above 10 ug/100cm² (microgram per square centimeter) of light fixture surfaces shall be re-cleaned and additional testing performed until a level of <10 ug/100cm² is achieved. In addition, other fixtures may also require additional cleaning following a review of cleaning and testing protocols.
 - 8. If leaks occur onto highly absorbent materials such as carpet, clothing, etc., the District Project Manager shall be contacted immediately. District or Districts Project Consultant shall develop an appropriate plan for the remediation of any PCB contamination identified outside of the fixtures prior to performing such work.
 - 9. District shall separate the ballast from all other contaminated materials (i.e., debris) such as gloved, ground cloths, rags, paper towels, lab coats, etc. Place all non-intact (leaking) ballasts directly into approved container for transportation. If non-intact ballasts are not placed directly into approved containers District shall double bag and label with fixture identification from which it was removed prior to transportation to a consolidation point and placement into an approved storage container. Place all contaminated cleaning materials in double plastic bags and place into an approved

container for storage. Dispose of all PCB contaminated material in the appropriate PCB waste containers in the designated storage area within 8 hours of removal from fixture.

3.4 STORAGE OF PCB CONTAINING MATERIALS

A. Requirements for Temporary Disposal Storage Areas

1. The District shall be responsible for the proper on-site storage of PCB containing articles, ballasts, and PCB contaminated debris in concentrations of less than 500 ppm. These materials shall be stored in DOT / EPA approved 55 gallon drums.
2. The following are specific requirements for temporary storage for disposal areas (i.e., Areas where PCB's are to be stored less than 30 days):
 - a) The equipment or container must have an attached notation which states the date the equipment or container was removed from service.
 - b) Only non-leaking articles or equipment may be stored in this type of area. Leaking articles or equipment must be placed in a non-leaking container that contains enough absorbent material to absorb any liquid PCBs remaining in the item.
 - c) No drums with liquids having a PCB concentration equal to or greater than 500 ppm may be stored in this type of area.
 - d) Drums of liquids that have a PCB concentration of 50 to 499 ppm may be stored in the area if the area has a spill prevention and control plan countermeasure plan. Each drum must have a notation that says the liquids in the drum do not exceed 500 ppm.
 - e) The area must be marked with a large PCB label.
 - f) Non-liquid items contaminated with PCBs (soil, rags, etc.) may be stored in containers.
 - g) The area must be inspected for leaks at least once every 30 days, and any leaked material immediately cleaned up.

B. Requirements for Disposal Storage Areas

1. The following are specific requirements for permanent PCB storage for disposal areas (i.e., Areas where PCB's are to be stored more than 30 days but less than one year):
 - a) The area must have an adequate roof and walls to prevent rain water from reaching stored items and to prevent the accumulation of standing water.
 - b) The area must be secure in a way to inhibit access to materials and containers by the public or other building occupants.
 - c) The area must have floors and continuous 6-inch high curbing. The floor and curbing must 1) be constructed of smooth and impervious materials (i.e., Portland cement, concrete or plastic sheeting); and 2) provide a containment volume equal to at least two times the internal volume of the largest article or container being stored, or 25 percent of the total volume of all articles or containers stored, whichever is greater.
 - d) The area cannot be located near or have access to drains, valves, expansion joints or sewer lines, or be within the 100- year flood plain.
 - e) The area must be marked with a large PCB label. All doors to the building containing the permanent storage for disposal area (if such an area is within a

building) also must be marked.

- f) Drums of PCB oil/debris and PCB equipment must have the date they were removed from service for disposal marked on them, and they must be labeled with the ML mark.
- g) Each drum of PCB oil/debris must have a record of the quantity of each batch of PCBs added to the drum and the earliest date each batch was added to the drum.
- h) The equipment and drums in the area must be inspected for leaks at least once every 30 days, and any leaked liquids cleaned up immediately (see details on cleaning up leaked material).
- i) Any leaking containers and articles must be transferred immediately to properly marked EPA-approved PCB containers.

3.5 POST VERIFICATION TESTING

- A. The District or Districts contracted representative shall be responsible for the collection of post verification sampling of decontaminated fixtures.
- B. The District or Districts contracted representative shall Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a) (6) (i)-(ii).
- C. Post verification testing will be performed initially on approximately 10% of fixtures that have been cleaned and decontaminated of assumed PCB spill material. Following the results of the first 20 tests, the District or Districts representative may request from the EPA that a smaller percentage of cleaned fixtures be sampled.
- D. Analysis of the required PCB verification sampling shall be performed by an accredited third party laboratory using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).
- E. Fixtures which indicate detectable PCB levels above 10 ug/100cm² (microgram per square centimeter) of light fixture surfaces shall be re-cleaned by District. A thorough visual inspection or additional testing shall be performed until a level of <10 ug/100cm² is achieved. In addition, other fixtures may also require further cleaning following a review of visual inspection, cleaning, and testing protocols.

3.6 TRANSPORTATION

- A. The District shall be responsible for contracting to a EPA licensed firm the proper transportation of all Hazardous and Special waste from facility sites to regulatory permitted facilities.
- B. Prior to the transportation of PCB containing materials from site, District will ensure that the District facility has received a TSCA EPA Identification number.
- C. Storage containers shall be suitable to receive and retain any PCB-containing or contaminated materials until disposal or incineration at an approved site. They shall comply with container specifications set forth in 49 CFR 178.80, 178.82, 178.102 or 178.116. Containers shall be labeled with waterproof print and permanent adhesive in accordance with OAR, OSHA, DOT and EPA regulations.

- D. PCB containing or PCB contaminated waste, indicating a PCB concentration of > 50 ppm PCB's, shall be containerized in waste containers approved by the Oregon Department of Transportation (DOT) for hazardous waste.
- E. A Uniform Hazardous Waste Manifest shall accompany all waste materials containing PCB in concentration >50 ppm. Waste requirements of 40 CFR 761.207 – 761.209 shall apply to all PCB containing waste transported off site.
- F. District shall ensure Waste Transporters are currently licensed under Federal and State regulations to transport hazardous (PCB containing) waste from site.

3.7 DISPOSAL

- A. The District shall be responsible for following all current waste handling, transportation, and disposal regulations for each work site. The District shall comply with the following EPA regulations and U.S. Department of Transportation and EPA requirements.
- B. District shall ensure the complete and total removal of all PCB waste from the District facilities as required in the project scope of work.
- C. District shall be responsible for the disposal/incineration of all PCB remediation waste, from the District Schools with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(2)(i) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR §§ 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
- D. District shall ensure the disposal/incineration of all PCB remediation waste, from District facilities, with a PCB concentration of \geq 50 ppm in accordance with 40 CFR § 761.61(a)(2)(ii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
- E. District shall ensure the disposal/incineration of all PCB bulk product waste, including fluorescent light ballasts containing PCBs in the potting compound, from District facilities in accordance with 40 CFR §§ 761.62(a)(1) - (7).
- F. District shall ensure all copies of Certificates of Disposal for the disposal of the PCB wastes are received.
- G. District shall ensure all copies of Certificates of Destruction for the incineration of the PCB wastes are received.
- H. District shall remove containers from site within ten calendar days, or at different time intervals if permitted, in writing by the owner, after collection for disposal or incineration at a site operated in accordance with the provisions of 40 CFR 761 (PCB waste) and OAR 340-113 and 40 CFR 273.
- I. Mercury-containing lamps shall be disposed of as a universal waste under current Federal and State regulations.

3.8 FORMS AND RECORDING DOCUMENTS

(See Attached Documents)

Form-1 Lighting Retrofit PCB Inspection Log

Form-2	Lighting Retrofit Inspection, Contaminated Fixture Record
Form-3-1	Lighting Retrofit Inspection, PCB Contamination of Floor and Furniture Record
Form-3-2 (Page 2)	Lighting Retrofit Inspection, PCB Contamination of Floor and Furniture Record
Form-4	PCB Storage Area Inspection Log

END OF SECTION

Form #1
South Lane School District
PCB Inspection Log

PAGE NO. ____ OF ____

SCHOOL SITE: _____ INSPECTION DATE: _____
 BUILDING: _____ INSPECTOR: _____

ROOM ID	FIXTURE ID	PCB BALLAST (yes / no)	NUMBER OF BALLAST	LEAKING (yes / no)	DESCRIPTION OF LEAK					INSTALLED I.D. STICKER
					PF	PB	PW	S/H	LO	
		Y <input type="checkbox"/> N <input type="checkbox"/>	1 <input type="checkbox"/> 2 <input type="checkbox"/>	Y <input type="checkbox"/> N <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Y <input type="checkbox"/> N <input type="checkbox"/>
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Form #2
South Lane School District Inspection
Contaminated Fixture Record

PAGE NO. ____ OF ____

SCHOOL SITE: _____ REMEDIATION DATE: _____

BUILDING: _____ CONTRACTOR: _____

A. Diagram the fixture layout in the room.

1. Room #: _____ Fixture #: _____
2. Indicate "north" on the diagram.
3. Label rows and fixtures starting with row "1", fixture "A", (1A, 1B, 2C, etc.) from north and left corner of the room.

B. PCB Remediation work Performed.

☐ Removal of non-intact PCB ballast

☐ Decontamination of PCB material from fixture

1. Is there PCB contamination other than on the ballast? ☐ Yes ☐ No (if yes, circle the area of contamination on the diagram).
2. Mark an "X" in the circle of the diagram which identifies the contamination point. Add dimensional specifics in order to relocate.
3. If present, has the PCB contamination been removed and is the area now "visually clean"? ☐ Yes ☐ No.
4. Disposal barrel number: PCB ballast _____, PCB debris _____.
5. Printed Name/Signature: _____

ROOM DIAGRAM

Form #3
South Lane School District Inspection
PCB Contamination of Floor and/or Furniture

(Use additional paper as needed)

A. Describe the problem and work/re-mediation you performed.

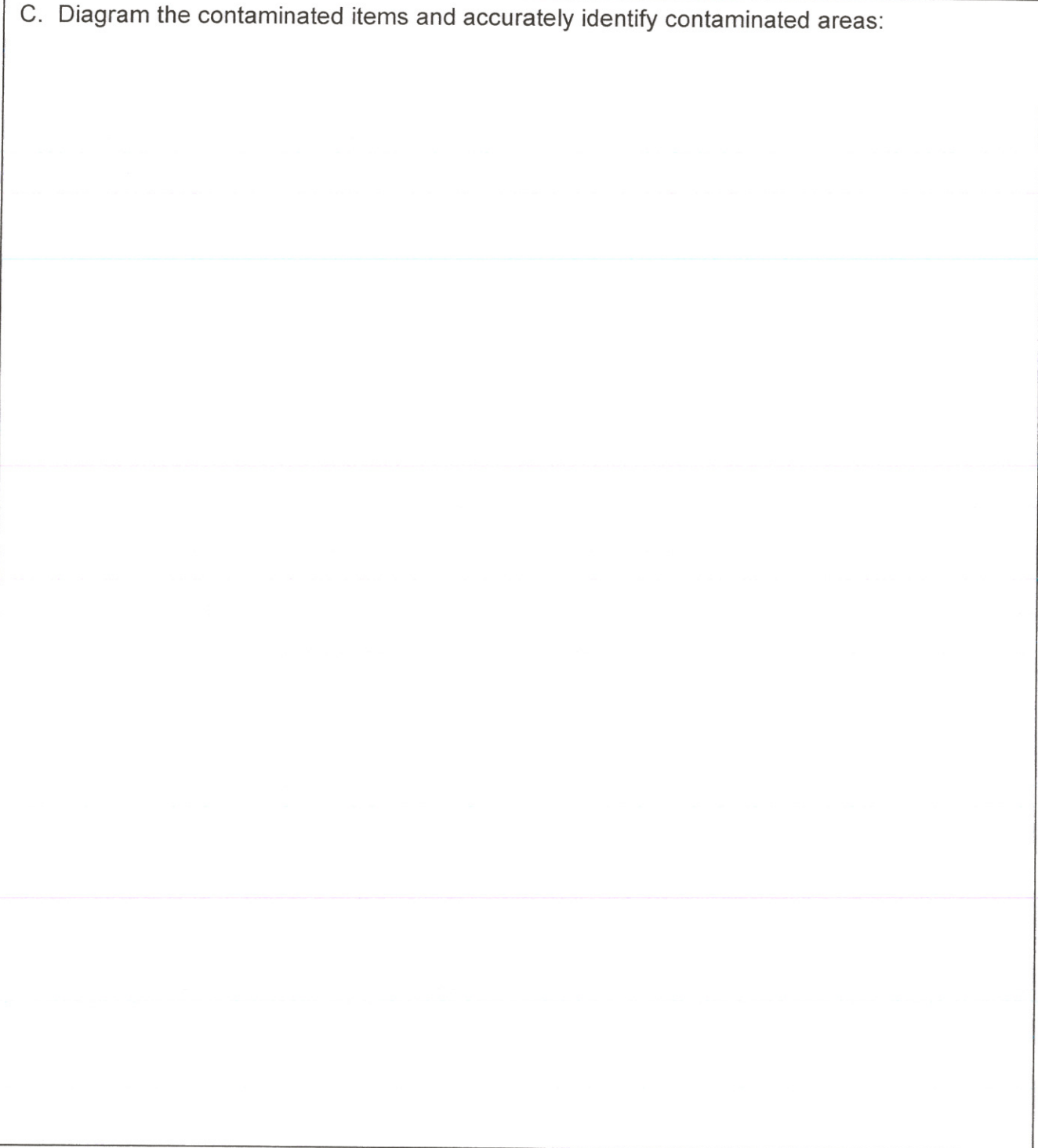
B. Diagram the room layout, floor, furniture, and accurately identify contamination.

1. Current date: _____ Location: _____
Type room: _____ Room #: _____ Fixture #: _____
2. Indicate "north" on the diagram.
3. Attach the fixture diagram to this form.
4. Mark an "X" in areas identifying contamination points. Add dimensional specifics in order to relocate.
5. Has the PCB contamination been removed and is the area now "visually clean"?
Yes _____ No _____
6. Disposal barrel number: (PCB debris): _____.
7. Wipe sample kit I.D. #: _____; _____; _____;
_____; _____; _____.
8. Printed Name/Signature:

Form #3-2
South Lane School District Inspection
PCB Contamination of Floor and/or Furniture

(Use additional paper as needed)

C. Diagram the contaminated items and accurately identify contaminated areas:



Facility / Building: _____.

[illegible]